

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PATELUNAS
(UPS/USPS-T15-1 through 9)**

(July 29, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Patelunas (UPS/USPS-T15-1 through 9).

Respectfully submitted,



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Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PATELUNAS**

UPS/USPS-T15-1. Please refer to your response to DMA/USPS-T7-19 (redirected from witness Crum) in Docket No. MC97-2. Please confirm that costs for *moving empty equipment are distributed to classes and subclasses of mail in essentially the same proportion as the IOCS observations for postal employees handling mail, without regard to the type of equipment being moved.* If not confirmed, please explain in full.

UPS/USPS-T15-2. Are certain types of equipment (the moving of which is captured in "moving empty equipment") used uniquely or significantly for unique classes, shapes, or other types of mail? If so, specify what types of equipment are used for what classes, shapes, or other types of mail.

UPS/USPS-T15-3. Please provide a breakdown of moving empty equipment costs by type of empty equipment being moved.

UPS/USPS-T15-4. Has any analysis or other study, investigation, or inquiry been performed to determine if the costs associated with moving empty equipment could be distributed to specific classes or shapes of mail which give rise to those costs? If yes, please provide these studies and explain.

UPS/USPS-T15-5. Has the use of postal packs affected the costs associated with moving empty equipment?

**INTERROGATORIES OF UNITED PARCEL SERVICE
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UPS/USPS-T15-6. Are postal packs used uniquely for parcel shaped mail? Please explain.

UPS/USPS-T15-7. Please explain the operation of the Integrated Mail Handling System and why it is expected to result in cost savings. Discuss what types of operations, equipment, mail classes or subclasses, mail shapes, and facilities with which Integrated Mail Handling System is associated.

UPS/USPS-T15-8. Does the Postal Service provide seven day a week delivery in any market? If not, does the Postal Service have plans to provide seven day a week delivery in any market(s)? If the Postal Service is providing seven day a week delivery anywhere,

- (a) In which market(s) is seven day a week delivery available?
- (b) Is seven day a week delivery limited to a particular class or classes of mail?
- (c) What are the costs attributable to providing seven day a week delivery?
- (d) Does the Postal Service have plans to expand the markets in which seven day a week delivery is available? If so, please describe those plans.
- (e) Does the Postal Service have plans to make permanent the seven day a week delivery policy? If so, please describe those plans.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PATELUNAS**

UPS/USPS-T15-9. (a) Within the last three (3) years, has the Postal Service purchased any vehicles designed to be used for the purpose of delivering parcels? If so, please indicate the number and the cost of the vehicles purchased.

(b) Within the current fiscal year ending September 30, 1997, has the Postal Service purchased or does the Postal Service have plans to purchase any vehicles designed to be used for the purpose of delivering parcels? If so, please indicate the number and the cost of the vehicles.

(c) Within the next fiscal year ending September 30, 1998, does the Postal Service have plans to purchase any vehicles designed to be used for the purpose of delivering parcels? If yes, please describe those plans.

(d) If the answer is yes to (a), (b) or (c) above, please indicate to what class(es) or subclass(es) of mail are the costs attributable?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: July 29, 1997
Philadelphia, Pa.